

DECLARATION OF JOEL HALL

My name is Joel Hall. I am an adult resident of Coweta County, Georgia. I state the following:

1. Jon Hall is my younger brother. I am 3 years older than him.
2. I remember my parents having a lot of arguments. Money was a battle. Mom would pick at Dad. She would start nagging and take it to the point where Dad would argue back.
3. There was a lot of pushing and shoving. Dad would go to the bedroom and Mom would be beating on the door trying to get in. There was always friction and tension between Mom and Dad. I remember Mom getting hurt real bad in one fight.
4. Mom always seemed to be overwhelmed. Dad was not around much. He had to leave for work at four in the morning. Mom was not involved in the lives of us children. We raised ourselves. It was every child for themselves. We worked it out among ourselves. Our parents gave us no guidance. Now I and all my siblings have addictions, marital problems and major dysfunction. One of my brothers is bi-polar.
5. We were not helped with homework and neither parent attended our school conferences.
6. Mom used to hit me with a wooden spoon that she broke on me. I was glad to see it go. She even hit me with the wire part of the fly swatter. We got threatened with it all the time.
7. I remember one time when Mom chased Dad with a shotgun. She told him to run because she would give him until the count of ten. I also remember Dad pulling the phone out of the wall when they were fighting.
8. One time all the kids piled into the station wagon to go to the drive-in movie and Mom and Dad got into it. All of us kids got out of the car because we knew we would not be going to the movie.
9. Every weekend, I had to get my suitcase and go to my grandparents, even if I had to walk. It was a violent household too. I remember my grandfather striking my great grandfather who was deaf as a post but who would say he heard moon dogs.

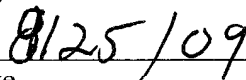
10. We did not have routine medical care. I always had fluid in my ears. I was deaf and had a speech impediment because of this. In addition I was color blind and wore glasses. I was an easy target for being picked on because of my problems. Mom never came to my aid.
11. We did not have dental care either. I was 13 before I went to a dentist. I had to have five teeth pulled.
12. Either there were no services available in our town, or Mom did not know how to apply for services.
13. Some times Dad would go to Pittsburgh to work and not come home for a couple of days.
14. I was with my dad when he died. And even though my dad died two days before my birthday and we were going to the funeral on my birthday, Mom never comforted me or talked to me about his death. The family never talked about Dad's death.
15. Mom got married to Ed Alexander three months after Dad died. She was worried about security and afraid she would loose the house. It was very important to her to have that house.
16. Even though Mom was worried about money, after her parents died she had money. She had stocks and she is real savvy with money. Before the recent "crash" her stocks were worth a quarter of a million dollars.
17. After Mom married Ed Alexander she moved with him and left Sheryl, Jon and me at the family house alone. Sheryl the oldest of us would have been around 16 years of age.
18. Ed Alexander was an alcoholic. They were getting a divorce when he died of a stroke.
19. Mom worked in bars. Some of the guys she dated were hard drinkers.
20. Jon had numerous accidents when he was growing up and hit his head. We had a field car that we used strictly on the four acres around our house, one day Jon was driving it and ran into a tree. Another time he had an accident when he had a girl sitting on his lap and he ran into something. Another time Jon was riding my motorcycle and ran into a school bus.
21. I joined the military in 1980 and left while Jon was still in his teens. Jon did not start drinking until I was gone.
22. Jon lived with me and my wife one time when he and Billie were separated. He would unplug the telephone when he wanted your undivided attention.

23. Jon trial attorneys did not contact me. I would have been able and willing to testify to the above matters at Jon's trial.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.



Joel Hall



Date